

**UNITED STATES BANKRUPTCY COURT  
MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Brett Michael Harer  
**Debtor 1**

MC Federal Credit Union  
**Movant(s)**

v.

Brett Michael Harer

**Respondent(s)**  
Jack N. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
**Additional Respondent**

**Chapter 13**

**Case No.** 4:23-BK-01767-MJC

**Matter:** Motion for Relief from the Automatic Stay

**Document No.** 26

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Brett Michael Harer, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Upon information and belief, the averment as stated in Paragraph 2 is admitted.
3. Paragraph 3 contains a conclusion of law to which no response is required.
4. Admitted in part, denied in part. It is admitted that Debtor(s) have defaulted on the payments. By way of further response, Debtor(s) stand ready to bring their account current per stipulation terms agreeable to the parties. Debtor(s) are without sufficient knowledge as to the truth of the remaining costs incurred; therefore, it is denied.
5. Upon information and belief, the averment as stated in Paragraph 5 is admitted.
6. Admitted.
7. Paragraph 7 is omitted from the original pleading.
8. Paragraph 8 contains a conclusion of law to which no response is required.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,  
**DETHLEFS PYKOSH & MURPHY**

Date: November 8, 2023

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire  
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*Attorney for Debtor(s)*

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**CERTIFICATE OF SERVICE**

I hereby certify that on Wednesday, November 8, 2023, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay** in this proceeding via electronic means upon the following:

Milos Gvozdenovic, Esquire  
Weltman, Weinberg & Reis Co., LPA  
965 Keynote Circle  
Cleveland, OH 44131  
*Counsel for Movant(s)*

Jack H. Zaharopoulos, Esquire  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

Office of the United States Trustee  
Sylvia H. Rambo United States Courthouse  
1501 North Sixth Street, Floor 3  
Harrisburg, PA 17102

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.  
Paralegal for Paul D. Murphy-Ahles, Esquire